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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION**

STEPHANIE SANDERS-MILLARD,

Plaintiff

v.

Case No. 8:23-cv-01978-JWH-KES

UNIQ CREDIT SOLUTIONS, INC.,

Defendant.

MOTION FOR ENTRY OF CLERK'S DEFAULT

NOW COMES Plaintiff, STEPHANIE SANDERS-MILLARD, and pursuant to Fed. R. Civ. P. 55(a), seeking entry of Clerk's default against defendant, UNIQ CREDIT SOLUTIONS, INC., and in support thereof, stating as follows:

1. On October 20, 2023, Plaintiff filed the instant action against UNIQ CREDIT SOLUTIONS, INC. ("Defendant") seeking redress for violations of the Credit Repair Organizations Act ("CROA"), pursuant to 15 U.S.C. § 1679 et seq., the California Credit Services Organizations Act ("CCSOA"), pursuant to Cal. Civ. Code § 1789.10 et seq., and the California Fair Debt Settlement Practices Act ("CFDSPA"), pursuant to Cal. Civ. Code § 1788.300 et seq. [Dkt. 1]

2. Plaintiff's claims arise from Defendant's abusive unlawful practices.

1 3. On November 7, 2023, Defendant was served with Plaintiff's complaint. [Dkt. 10]

2 4. Defendant's answer was due on or before December 27, 2023.

3 5. Despite being duly served with Plaintiff's complaint, Defendant has failed to appear or
4 otherwise respond to Plaintiff's complaint. *See* Exhibit A; Affidavit of Alexander J. Taylor.

5 6. Pursuant to Fed. R. Civ. P. 55(a), Plaintiff is seeking the entry of Clerk's default as a result
6 of Defendant's failure to respond to Plaintiff's complaint.
7

8 **WHEREFORE**, Plaintiff respectfully requests the entry of Clerk's default against Defendant
9 UNIQ CREDIT SOLUTIONS, INC., and for any further relief the Court deems just and proper.
10

11 DATED: January 5, 2024

Respectfully submitted,

12 **STEPHANIE SANDERS-MILLARD**

13 s/ Alexander J. Taylor

14 Alexander J. Taylor, Esq.

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Counsel for Plaintiff
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CERTIFICATE OF SERVICE

I hereby certify that on January 5, 2024, I electronically filed the foregoing with the Clerk of the Court for the Central District of California by using the CM/ECF system.

Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

I further certify that some of the participants in the case are not CM/ECF users. I have mailed the foregoing document by USPS Priority Mail, postage prepaid to the following participants:

Uniq Credit Solutions, Inc.
C/O Registered Agent
Best Delaware Registered Agent LLC
8 The Green, Suite F
Dover, Delaware 19901

/s/ Alexander J. Taylor